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January 26, 2024

**VIA ECF**

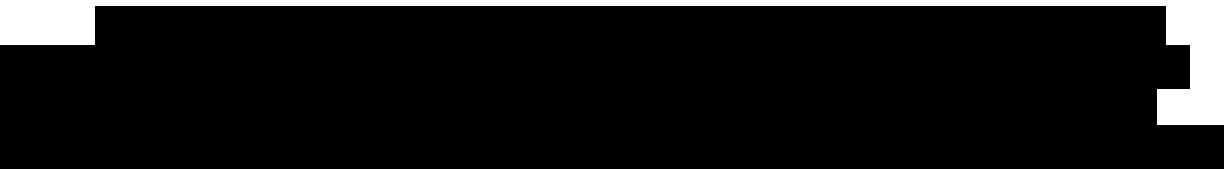
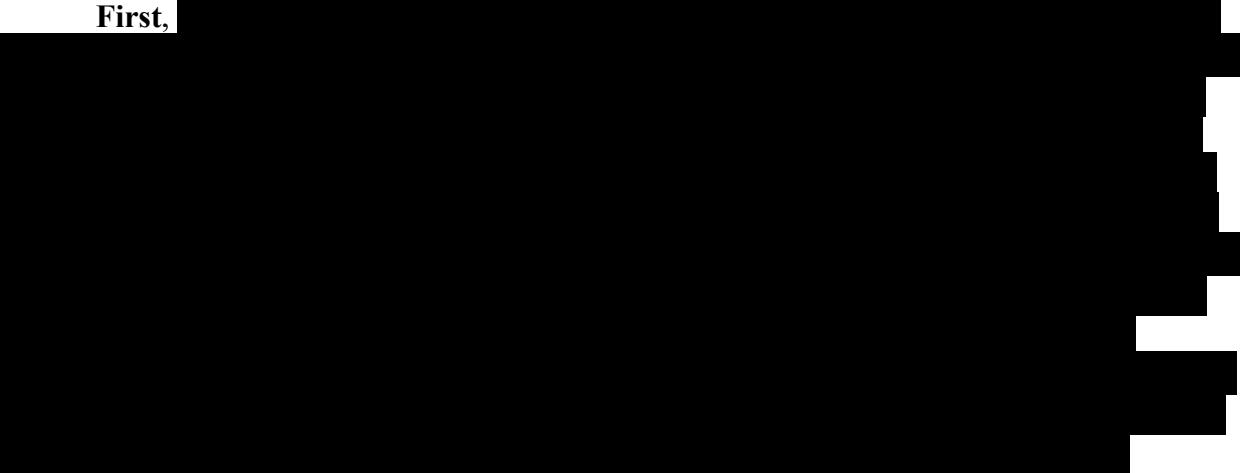
The Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Juan Orlando Hernandez, et al*, 15 Cr. 379 (PKC)

Dear Judge Castel:

On January 23, 2024, the Court appointed me to represent Juan Orlando Hernandez, whose trial is scheduled to begin on February 12, 2024, so that I could assist Mr. Hernandez's current counsel, Raymond Colon. I write to request an adjournment of the trial for two reasons:

**First,**



[REDACTED]

[REDACTED]

[REDACTED]

**Second**, since I was appointed 3 days ago, I have learned that the volume of material I need to review is daunting and that there are procedural issues related to classified information in this case that are highly unusual, that complicate the representation. I also understand that there are documents and recordings in Spanish that have not all been translated. I do not speak Spanish. Now that I have a better sense of what is involved in this case, even under the best of circumstances, it would be extremely challenging to effectively assist Mr. Hernandez in such a short amount of time. For example, I have been in contact with discovery attorney Emma Greenwood's office regarding getting a copy of the discovery. It will be delivered to me tomorrow, Saturday, because it took *overnight* to copy all of the discovery onto the hard drive, because it is over a terabyte of information. To put that into perspective, a terabyte equates to approximately 85.8 million pages of text or 17,000 hours of audio. While I could obviously not be expected to review that material by February 12, I am concerned that reviewing even the most relevant portions will be impossible.

While I can effectively represent Mr. Hernandez given enough time to prepare, the combination of [REDACTED] and the particularities of this case compel me to ask for an adjournment to protect Mr. Hernandez's due process rights and right to the effective assistance of counsel. I know that the Court has worked very hard on the scheduling of this case, based on the discussions that were held at the January 23<sup>rd</sup> hearing. I deeply apologize to the Court for finding myself in these circumstances and the inconvenience I am causing to the Court, the Government, and the other parties. I searched myself to see if there was a way that I could keep the trial schedule consistent with my constitutional and ethical obligations to my client. But at this time, I request an adjournment of at least 90 – 180 days to help Mr. Colon further prepare for trial and provide effective assistance to Mr. Hernandez.

I thank the Court for its consideration.

Respectfully submitted,

/s/

Renato C. Stabile

cc: All counsel  
via ECF